

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and ERS.

ORDER GRANTING FIVE HUNDERED FORTY-THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III DEBTORS

Upon the *Five Hundred Forty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* (the “Five Hundred Forty-Third Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and with the Commonwealth, the “Objecting Debtors”),

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Forty-Third Omnibus Objection.

dated October 28, 2022, for entry of an order disallowing in their entirety certain claims filed against the Objecting Debtors, as more fully set forth in the Five Hundred Forty-Third Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-Third Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Forty-Third Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Five Hundred Forty-Third Omnibus Objection (collectively, the “Claims to Be Disallowed”) having failed to comply with the applicable rules for filing a proof of claim; and the Court having determined that the relief sought in the Five Hundred Forty-Third Omnibus Objection is in the best interests of the Objecting Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-Third Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Forty-Third Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22747 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-Third Omnibus Objection

Five Hundred Forty-Third Omnibus Objection
Exhibit A - Claims to Be Disallowed

					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
1 PABON VELAZQUEZ, ANA C. P.O. BOX 661 ARROYO, PR 00714	10/30/2019	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	172193-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Municipal Hospital of Arroyo, which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.					
2 ROSARIO GUTIERRES, VILMA I. JENARO A. MEDINA ROSARIO, ESQ. PO BOX 79366 CAROLINA, PR 00984-9366	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	83956	\$24,000.00*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Municipality of San Juan and other defendants, which are not part of the Title III proceedings.					
TOTAL					\$24,000.00*